

**Response Deadline: March 1, 2016, at 4:00 p.m. (Eastern Time)**  
**Hearing Date: March 29, 2016, at 10:00 a.m. (Eastern Time)**

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*Counsel for Lehman Brothers Holdings Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

	x	
	:	<b>Chapter 11</b>
<b>In re:</b>	:	
	:	<b>Case No. 08-13555 (SCC)</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:	
	:	
<b>Debtors.</b>	:	
	x	

**NOTICE OF HEARING ON MOTION TO ENFORCE AUTOMATIC STAY, PLAN AND  
CONFIRMATION ORDER AGAINST iFREEDOM DIRECT CORP. AND  
SECURITYNATIONAL MORTGAGE COMPANY**

**PLEASE TAKE NOTICE** that on February 17, 2016, Lehman Brothers Holdings Inc.  
("LBHI" or the "Plan Administrator"), as Plan Administrator for the entities in the above  
referenced chapter 11 cases (the "Debtors"), filed a Notice of Hearing on Motion to Enforce

Automatic Stay, Plan and Confirmation Order Against iFreedom Direct Corp. and SecurityNational Mortgage Company (the “Motion”), and that a hearing (the “Hearing”) to consider the Motion will be held before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 623 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **March 29, 2016, at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, preferably in text-searchable Portable Document Format (PDF) (with a hard copy delivered directly to Chambers), and shall be served upon (i) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 621; (ii) counsel for the Plan Administrator, Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110 (Attn: James N. Lawlor, Esq.) and Rollin Braswell Fisher LLC, 8350 E. Crescent Parkway, Suite 100, Greenwood Village, Colorado 80111 (Attn: Michael A. Rollin, Esq.); and (iii) the Office of the United States Trustee for Region 2, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: William K. Harrington, Esq., Susan Golden, Esq., and Andrea B. Schwartz, Esq.), so as to be so filed and received by no later than **March 1, 2016, at 4:00 p.m. (Eastern Time)** (the “Response Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Motion or any relief requested therein, the Plan Administrator may, on or after

the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

**PLEASE TAKE FURTHER NOTICE** that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York  
February 17, 2016

/s/William A. Maher

William A. Maher  
Paul R. DeFilippo  
James N. Lawlor  
Adam M. Bialek

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-and-

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